

ADMINISTRATIVE RECORD

July 7, 2000
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W.R. Grace Revised Draft Work Plan
Dated: July 3, 2000

Work Plan Comments

Number	Section	Page	Comment
1.	General		All property of Millwork West to be cleaned and moved at same time.
2.	General		Show line item on schedule (Figure 4-1) for the cleaning and temporary relocation of Millwork West property.
3.	General		Define temporary location of Millwork West business with storage location and retail location defined.
4.	General		Temporary relocation area shall have adequate secured storage, access to materials, retail space located with storage location, adequate utilities including phone, electrical, lavatory for employees and customers
5.	General		What are plans for rail car loading ramp?
6.	General		The continued operation of the planer is part of the UAO. This issue requires further discussion with regard to the storage of materials during pre and post planing, access to paper rapping, banding tools and ribbon, fork lift capabilities, cyclone operation, power source for operation, protection of personnel operating the planer.
7.	General		Dust control and traffic control shall address alternate disposal location.
8.	General		Visual is stated as the method to be used for adequate dust control. Discuss how air-sampling results of perimeter and personnel are to be incorporated into the quality control process for dust control.
9.	2.1.3	2-7	Office trailer for regulatory agencies and their contractor is to be provided with phone, fax and e-mail capability.
10.	2.1.5	2-9	Provide contractor name and results of the Historic Search Assessment.
11.	2.1.5	2-10	Discuss security at night, Sundays, and holidays.
12.	2.1.5	2-10	Appraisal and 3 category list to be completed. When and who obtains concurrence from the owners of Millwork West?
13.	2.1.6	2-12	Include EPA and Millwork West with City of Libby for approval of location of temporary relocation.
14.	2.1.6	2-12	2 nd paragraph only references planer operation that is not moving, but does not reference lumber business relocation which W.R. Grace is temporarily relocating and moving back following restoration.
15.	General		Antique scale in lumber storage building (?) needs to be addressed with the City of Libby.
16.	2.1.11	2-16	Address content in building and their relocation.
17.	2.1.13	2-17	Locate tailings to be used for cover on drawings. Who gave approval for use and as approved cover material?
18.	2.1.14	2-17	Clear and grubbing to be completed with dust control measures.
19.	2.1.14	2-17	Provide grid of site for soil sampling.
20.	2.1.14	2-17	Discuss method to be used next to building foundation and/or posts on interior and exterior.
21.	General		Discuss and provide table of action levels for perimeter air sampling and soil confirmation samples.

Appendix A

Number	Section	Page	Comment
1.	2.0	A-2	3 rd paragraph states that " Perimeter samples shall be collected during each day of asbestos abatement operations." This is not an asbestos abatement operation, it is a CERCLA Action.
2.	2.0	A-2	Need to include "soil samples" in 3 rd paragraph.
3.	2.0	A-2	4 th paragraph should address all perimeter sample analysis as TEM ISO 10312.
4.	2.0	A-2	Last line mentions an on-site laboratory, but this is not identified on Page 2-2 under subcontractor support.
6.	2.1	A-4	Provide flow rate of personnel and for ambient sampling rather than a broad range for both.
7.	2.3	A-5	Provide the standard to be used for the duration of the sample collection, flow rate, duration of the implementation of aggressive means for clearance samples.
8.	3.0	A-6	The anticipated depth of soil excavation changed from 12 inches in the last submittal to 6 inches, which is inconsistent with the UAO and Table B4-1, page B-26, Surface Excavation Work Task which states 12-18 inches.
9.	3.0	A-6	Provide and define sampling number identification scheme.
10.	General		Address clean room, exhaust fan, and exclusion zone boundary samples.
11.	General		Personnel samples are to be taken for TWA and Excursion.

Appendix B

Number	Section	Page	Comment
1.	1.2	B-2	Include cleaning lumber company property and relocation.
2.	5.2	B-42	Address dust control during building decontamination.
3.	5.3	B-43	3 rd paragraph states that airborne dust in open well-ventilated areas of Libby work site where dust suppression is in place is not expected to exceed PEL's. This paragraph does not clearly state that respiratory protection will be used. and implies that PPE is not needed and will be evaluated as to the need of respiratory protection. To not wear proper PPE (respiratory protection) without documentation that H&S controls (dust control) measures are working is not allowed. Any downgrade of PPE must be in conformance with regulatory requirements.
4.		B-44	Table B5-2; Address PPE during cleaning of Millwork West business property.
5.	5.3	B-45	Provide or reference location of change out schedule presented in Attachment 42-4 of SMS42. Could not locate schedule.
6.	6.0	B-46	This whole section is confusing. Provide table outlining sample locations, sample type, sample test method, and sample distribution according to UAO.
7.	6.1	B-46	Background to be collected on 2 separate days.
8.	8.1	B-51	Based on last sentence of 1 st paragraph, #4 should precede #3.
9.	8.3	B-53	Provide filter size for discharge water.

Appendix B; Attachment B-2

Number	Section	Page	Comment
1.	2.0	B2-3	Figure A-1 not Figure B-1 shows proposed sample locations.

Appendix C

Number	Section	Page	Comment
1.	2.0	C-1	Include lumber retail office in list.
2.	3.0	C-1	State that equipment and material to be disposed shall be compensated to owner.
3.	General		The exterior walls and roof are not addressed in the evaluation.
4.	General		This is laden with opinion and assumptions that are irrelevant with regard to the feasibility of the two approaches. Please stick to specifics and details.

Appendix D

Number	Section	Page	Comment
1.	1.0	D-1	Include retail office of lumber business.
2.	General		Some of the buildings to be decontaminated are not in a condition that will prevent water under pressure from migrating to the exterior. How are these areas to be cleaned if wrapped in plastic to create negative pressure and prevent overspread issues?
3.	3.5	D-4	Provide location of Material Decontamination Unit on figures. The critical Barriers section states that all openings (wall penetrations) will be covered to ensure that the work area is isolated from the outside air but that they do not want to use poly on the interior walls because they need to be cleaned. Many of these buildings have problems with wall penetrations to the extent that they will leak from numerous locations.
4.	3.7	D-5	Does not address Millwork West retail office.
5.	3.7.1	D-5	The structure has open sides. Are these closed with poly sheeting?
6.	5.1	D-7	If the large lumber warehouse is not the lumber storage as marked on Figure 1-3, Then the lumber storage has vermiculite in the walls.
7.	5.2	D-7	After vermiculite is scoped, is the HEPA Vac used?
8.	5.5.2	D-9	No capping or covering of material after floor is removed. This must be cleaned.
9.	General		Metal panel removal for a partial inspection of the shingles may not be adequate. This is dependent on condition of metal roof and the sub-base beneath the shingle attached to the rafters..

Appendix E

Number	Section	Page	Comment
1.	General		Provide traffic control plan for all scenarios since they are not defined and definite.
2.	4.0	E-4	Since it is stated that all drivers have radios, are there any truck turnout points, with road markings every 250 to 500 feet will allow the drivers to communicate position to each other so the down hill vehicle can pull off.
3.	Figure		E-2 & E-3 Correct disposal locations.
4.	General		Estimate number of trucks, types, # of round trips per day.

Appendix F

Number	Section	Page	Comment
1.	2.0	F-1	Provide new location for disposal based on latest events.
2.	3.0	F-1	Attachment B is not provided in Appendix F.
3.	4.0	F-2	Locate well and holding tank with decon area on map of mine.

Appendix G

Number	Section	Page	Comment
1.	1.1	G-1	Last Bullet; Detailed plans of wash pad are not provided in Decontamination Appendix or H&S Plan.

Appendix H

Number	Section	Page	Comment
1.	2.3.2	H-3	Include lumber retail outlet.
2.	2.3.2	H-3	Add building #'s to figures 1-3 and 2-1.
3.	2.3.2	H-3	Names in text of buildings do not match drawings.
4.	General		Include section addressing the transfer of data to regulatory agencies. Provide table with submittal registry, analytical results, sample locations, sample frequency, sample results, turnaround time, and UAO requirements for submittal of data per sample type.

Appendix I

Number	Section	Page	Comment
1.	General		Include inventory list, appraised values, items to be cleaned, items to be disposed.
2.	General		Identify which items are to be relocated, and which items stay with the planer operation. Those items to stay, identify storage location.

Appendix J

Number	Section	Page	Comment
1.	General		Note that it is 7 weeks to be approved, not 7 weeks for first submittal.
2.	General		Discuss repair of roof and walls impacted by the inspection and cleaning of buildings.
3.	General		Include road and parking areas vs. seeded areas.
4.	General		Discuss repair of floors, electrical, and planer room impacted by building decontamination.
5.	General		Discuss relocating lumber business back to site.